

LAW OFFICES OF
JEFFREY LICHTMAN

11 EAST 44TH STREET

SUITE 501

NEW YORK, NEW YORK 10017

www.Jeffreylichtman.com

JEFFREY LICHTMAN

JEFFREY EINHORN

PAUL TOWNSEND

PH: (212) 581-1001

FX: (212) 581-4999

August 1, 2018

BY EMAIL: Noah.Solowiejczyk@usdoj.gov

Noah Solowiejczyk, Esq.
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007

Re: United States v. Evans, et al., 17 CR 684 (ER)

Dear Mr. Solowiejczyk:

On behalf of defendant Tony Bland and pursuant to Fed.R.Crim.P. 16(a)(1)(E), I am writing to request that the government produce the following items which are material to the preparation of our defense and have yet to be turned over to counsel:

- 1) The December 9, 2016 warrant signed by the Hon. Jed S. Rakoff, and any related applications, affidavits, or periodic reports, which authorized the interception of calls occurring over (205) 266-4155, purportedly utilized by Rashan Michel, and (334) 750-1704, purportedly utilized by Chuck Person, as well as any conversations intercepted pursuant to this warrant;¹
- 2) The January 9, 2017 warrant signed by the Hon. Lewis A. Kaplan, and any related applications, affidavits, or periodic reports, which authorized the continued interception of calls occurring over the aforementioned telephone lines, as well as any conversations intercepted pursuant to this warrant;²

¹ See April 7, 2017 Affidavit of Special Agent Jason Wake ("Wake Aff.") in support of the government's application for a warrant to intercept communications occurring over (609) 933-7246, at p 12.

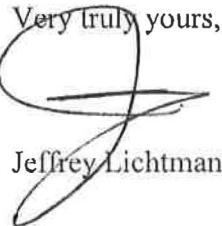
² See Wake Aff., at p. 12.

JEFFREY LICHTMAN

Noah Solowiejczyk, Esq.
Assistant United States Attorney
August 1, 2018
Page 2

- 3) The January 26, 2017 warrant signed by the Hon. Richard Berman, and any related applications, affidavits, or periodic reports, which authorized the interception of calls occurring over: (205) 245-9458, purportedly used by Chuck Person, as well as any conversations intercepted pursuant to this warrant;³
- 4) The February 10, 2017 warrant signed by the Hon. Paul A. Engelmayer, and any related applications, affidavits, or periodic reports, which authorized the continued interception of conversations occurring over (205) 266-4155 and (334) 750-1704, as well as any conversations intercepted pursuant to this warrant;⁴ and
- 5) The April 27, 2017 warrant signed by the Hon. J. Paul Oetken, and any related applications, affidavits, or periodic reports, which authorized the continued interception of calls occurring over (205) 266-4155, as well as any conversations intercepted pursuant to this warrant.⁵

Thank you for your attention to this matter, I remain available to discuss these requests should the need arise.

Very truly yours,

Jeffrey Lichtman

cc: All counsel (by email)

³ See Wake Aff., at pp. 12-13.

⁴ See Wake Aff., at p. 13.

⁵ See May 5, 2017 Affidavit of Special Agent Anthony Lupinacci in support of the government's application for warrant to intercept communications occurring over (609) 933-7246, at p. 12.